Colorado Department of Public Health and Environment

OPERATING PERMIT

Cargill Meat Solutions Corporation

First Issued January 1, 2002
Renewed: April 1, 2013

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	Cargill Meat Solutions Corporation	OPERATING PERMIT NUMBER
FACILITY ID:	0870024	**99OPMR210**
RENEWED:	April 1, 2013	
EXPIRATION DATE:	April 1, 2018	
MODIFICATIONS:	See Appendix F of Permit	

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et Supp.) and applicable rules and regulations.

ISSUED TO:

Cargill Meat Solutions Corporation
1505 East Burlington Avenue
Fort Morgan, CO 80701

PLANT SITE LOCATION:

1505 East Burlington Avenue
Fort Morgan, CO 80701

INFORMATION RELIED UPON

Operating Permit Renewal Application Received:	December 30, 2005
And Additional Information Received:	October 5, 2011

Nature of Business:	Meat Packing Plant
Primary SIC:	2011

RESPONSIBLE OFFICIAL

Name:	Nicole Johnson-Hoffman
Title:	A.V.P./General Manager
Phone:	(970) 867-8223

FACILITY CONTACT PERSON

Name:	Daniel Assmann
Title:	Environmental Superintendent
Phone:	(970) 867-1589

SUBMITTAL DEADLINES –

First Semi-Annual Monitoring Period:	April 1, 2013 – June 30, 2013
Semi-Annual Monitoring Period:	July 1 – December 31, January 1 – June 30
Semi-Annual Monitoring Report:	August 1, 2013 & February 1, 2014 and subsequent years
First Annual Compliance Period:	April 1, 2013 – December 31, 2013
Annual Compliance Period:	January 1 - December 31
Annual Compliance Certification:	February 1, 2014 and subsequent years

Note that the Semi-Annual Monitoring reports and the Annual Compliance report must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This source is a beef slaughter, fabrication, and processing facility located at 1505 East Burlington Avenue, Fort Morgan, Morgan County. The area in which the plant operates is designated as attainment for all criteria pollutants. Equipment at the facility includes a blood dryer, bone dryer, boilers, and an anaerobic wastewater treatment plant. All digester gas (biogas) generated in the treatment plant is rerouted for combustion in steam generating units. A flare combusts digester gas when the steam generators are unable to accept all biogas generated.

There are no affected states within 50 miles of the plant. There are no Federal Class I designated areas within 100 kilometers of the plant.

1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.

1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this Operating Permit and shall survive reissuance. This Operating Permit incorporates the applicable requirements (except as noted in Section II) from the following Colorado Construction Permit(s): 87MR168-(1 & 2), 90MR355-(1 & 2), 92MR1474, 96MR443, and 99MR0691.

1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:**

Permit Condition Number(s): Section II, Conditions 1.4 (flare operation) and 7.3 (opacity); Section IV - Conditions 3.g (last paragraph), 14 & 18 (as noted).

1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit. Either electronic or hard copy records are acceptable.

2. Alternative Operating Scenarios

2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.

2.1.1 No separate operating scenarios have been specified.

3. Prevention of Significant Deterioration

3.1 Based on the information provided by the applicant, this source is categorized as a minor stationary source for PSD as of the issue date of this permit. Any future modification which is major by itself (Potential to Emit of > 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

3.2 There are no other Operating Permits associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

4. Accidental Release Prevention Program (112(r))

4.1 Based on the information provided by the applicant, this facility is subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Summary of Emission Units

5.1 The emissions units regulated by this permit are the following:

Emission Unit Number	Facility ID	AIRS ID	Description	Pollution Control Device	Construction Permit Number
S001	B-1 & B-3	012 004	Kewanee Boilers Equipped with Dual Burners for Combustion of Natural Gas and BioGas. Model H35-600-G06, Serial No. 94774 rated at 25.1 MMBtu/hr (B-1) and Model H25-500-G02, Serial No. 57349 rated at 20.9 MMBtu/hr (B-3).	B-1: Low NO_x burners B-3: None	99MR0691
S002	B-2	013	One Cleaver Brooks Industrial Combustion Model LNDLG-420-P-A, Serial No. 35795-1, Natural Gas Fired Boiler. Rated at 47.3 MMBtu/hr maximum heat input.	Low NO_x Burners	96MR443
S003	B-4	007	One Cleaver Brooks Model CB600, Natural Gas Fired Boiler. Rated at 25 MMBtu/hr maximum heat input.	None	90MR355-1
S010	B-5	008	One Superior Model 7-6-3000-S150-WP-G/DG, Natural Gas and BioGas Fired Boiler. Rated at 25.1 MMBtu/hr maximum heat input.	None	None
S004	MP-6	002	Two Dupps 200 U Supercookers (steam heated)	Packed Bed	87MR168

Emission Unit Number	Facility ID	AIRS ID	Description	Pollution Control Device	Construction Permit Number
				Scrubber	
S005	MP-7	009	Duske Design Model TPD-8000, Rotary Bone Meal Dryer, Natural Gas Fired. Maximum Heat Input of 30 MMBtu/hr.	None	92MR1474
S006	MP-8	003	Duske Design Model TPD-2500, Rotary Blood Dryer, Natural Gas Fired. Maximum Heat Input of 8.7 MMBtu/hr.	None	87MR168
S007	B-9	011	Varec Model 244W Series, Combustor Flare, Design Rate 67.5 MMBtu/hr	None	99MR0691
S008	MP-10	014	Anaerobic Wastewater Treatment Plant	Flare	99MR0691
N/A			500 gallon aboveground gasoline storage tank	None	None
N/A			Generac 99A 05033S SG150 G13.3 150 kWnatural gas fired emergency generator engine Generac 94A 059235 SG060 G7.4 60kW natural gas fired emergency generator engine Generac 6500 XL 6.5 kW gasoline fired emergency generator engine	None	None

6. Compliance Assurance Monitoring (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

S001, S010, S007 and S008: Boilers B-1, B-3, and B-5; Flare; Wastewater Treatment Plant

SECTION II - Specific Permit Terms

1. S001 - Two Kewanee Boilers, 25.1 (B-1) & 20.9 MMBtu/hr (B-3)
S010 - One Superior Boiler, 25.1 MMBtu/hr (B-5)
S007 - Varec Combustion Flare, 67.5 MMBtu/hr
S008 - MP-10 - Anaerobic Wastewater Treatment Plant

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
Heat Input	1.1.1	Total Biogas heat input for three boilers: 297,000 MMBtu/year B-1: Natural Gas: 220,000 MMBtu/year B-3: Natural Gas: 183,100 MMBtu/year B-5: Natural Gas: 219,000 MMBtu/year		Recordkeeping	Monthly Annually
Flaring	1.1.2	Minimize flaring of biogas Biogas flare: 297,000 MMBtu/year			
PM Emissions	6	See Condition 6		Recordkeeping Calculation	Annually
NO_X Emissions	1.2	B-1: 5.50 tons/year B-3: 9.16 tons/year B-5: 10.74 tons/year Flare: 10.1 tons/year	B-1: Gas: 50 lbs/MMscf (low NOx burners) B-3 & B-5: Gas: 100 lbs/MMscf Biogas flare: 0.068 lbs/MMBtu		
CO Emissions	1.2	B-1: 9.24 tons/year B-3: 7.69 tons/year B-5: 9.02 tons/year Flare: 55.0 tons/year	Gas: 84 lbs/MMscf Biogas flare: 0.37 lbs/MMBtu		
VOC Emissions	1.2	Flare: 20.79 tons/year	Flare: 0.14 lb/MMBtu		
H_2S Emissions	1.2	0.53 ton/year	Sampled H_2S content and 98% control		
SO_2 Emissions	1.2	12.14 tons/year	See Condition 1.2.	Sampling, Recordkeeping & Calculation	Monthly
	1.3	12.14 tons/year (BACT)	See Condition 1.4.		
Opacity	7	Not to exceed 20%, except as provided below		Biogas and Natural Gas: Fuel Restriction	Annually At Startup and Semiannually
		Certain Operating Conditions - Not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes			
		Not to exceed 20% (**State-Only**)			
NSPS Subpart Dc	8	Recordkeeping and Reporting		Fuel Use	Daily

NSPS Subpart A	1.4	No visible emissions - See Condition 1.4 (**State-Only**)		See Condition 1.4	
Flare Stack Height	1.5	At least 54 feet above ground level			
Operation and Maintenance	1.6	See Condition 1.6			
Groundwater Use	1.7	Not to exceed 30%		Recordkeeping	Monthly
Biogas heat value	1.8			ASTM or other Division Approved Method	Semiannually
Compliance Assurance Monitoring	1.9	See Condition 1.9			

1.1 This source shall be limited to throughput as indicated below. Flow monitors will be used to monitor monthly biogas and natural gas use. The flow meters shall be calibrated on an annual basis. Annual records of the actual throughput shall be maintained and made available to the Division for inspection upon request. (Construction Permit 99MR0691 and Colorado Regulation No. 3, Part B, III.A.4)

1.1.1 Total heat input, through biogas into the three boilers, shall not exceed 297,000 MMBtu per year. Natural gas heat inputs for each boiler shall not exceed the limits listed in Summary Table 1 above.

1.1.2 Flaring of biogas shall be minimized, and such flaring shall be restricted to periods during which the boilers are either not in operation, or are unable to accept the entire biogas generated. Flaring of biogas shall not exceed the limit in Summary Table 1 above. Records of the operation of the flare shall be maintained.

1.2 Emissions of air pollutants, from each emission point listed above shall not exceed the limitations listed in Summary Table 1 above. The permit holder shall calculate annual emissions and keep a compliance record on site for Division review. (Construction Permit 99MR0691 and Colorado Regulation No. 3, Part B, III.A.4). Emissions shall be estimated using the emission factors listed above and the actual fuel consumption rates recorded in Condition 1.1. Emission limits are based on a heat content of 750 Btu/scf for biogas and 1020 Btu/scf for natural gas. Emission factors for biogas shall be corrected for Btu content, in accordance with Condition 1.8, based on the following equation:

Actual Emission Factor = (Listed Emission Factor lb/MMscf) x (Actual Gas Heat Content Btu/scf)/(1020 Btu/scf)

Compliance with the sulfur dioxide emission limit shall be demonstrated as follows:

H_2S content of the biogas combusted in the boilers and flare shall be sampled and measured on a monthly basis using gas chromatography during average biogas flow rates during the previous month (a biogas flow greater than 80% of the average biogas flow rate from the previous month is considered acceptable). H_2S content shall be used to estimate SO_2 emissions (assumes all sulfur is combusted). Records of the date, time and results of biogas samples shall be maintained for Division inspection upon request. Cargill may use the monthly average H_2S measurement of up to two readings, although only one reading is required. At least seven days must separate all readings. Cargill must use the two highest readings taken within a month that meet the above criteria if more than two readings are taken within a month, unless approved by the Division.

Average Biogas Flow Rate Conditions = Biogas Monthly Flow Total (MMscf)/Monthly Operating Hours of the biogas blowers

1.3 Emissions shall be controlled, and the permittee shall comply with the following BACT determinations:

The permittee shall use low sulfate water in the plant process so as to limit the Sulfur Dioxide emissions from biogas and natural gas combustion, to less than 12.14 tons per year. Supplemental controls may be used (if use of low sulfate water alone does not limit the emissions to the rate specified) to limit the total sulfur dioxide emissions to 12.14 tons per year. Compliance shall be monitored as set forth in Condition 1.2. (Construction Permit 99MR0691, revised in accordance with Section I, Condition 1.3)

1.4 S007 flare is subject to 40 CFR Part 60, Subpart A, as adopted by reference in Colorado Regulation No. 6, Part A, as follows. (This is a **state-only** requirement)

1.4.1 Flares shall be designed for and operated with no visible emissions as determined by the methods specified in 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. (60.18(c)(1))

An annual two-hour reading shall be performed in accordance with EPA Method 22. Records of Method 22 observations shall be maintained and made available for Division inspection upon request.

If visible emissions persist for longer than fifteen (15) continuous minutes at any time, the cause shall be determined and corrective actions taken

1.4.2 Flares shall be operated with a (pilot) flame present at all times, as determined by methods specified in paragraph 60.18(f). (60.18(c)(2))

1.4.3 The operating requirements as set forth in §60.18(c)(3 through 6).

1.4.4 The monitoring provisions as set forth in §§60.18(d), (e) and (f).

1.5 Stack height for the flare (S007, B-9) shall be at least 54 feet above ground level. (Construction Permit 99MR0691)

1.6 The permittee shall perform the following routine maintenance activities and recordkeeping activities:

1.6.1 Monthly inspection of the lagoon covers to identify leaks, tears, and capacity. Capacity will be subjectively identified as "low", "medium", or "high" based on the observer's experience and height of the cells of the lagoon cover.

1.6.2 Monthly inspection of the above ground piping leading from the basins to the MTARRI Scrubber vessels or the by-pass to the combustion units.

1.6.3 Monthly inspection of the piping leading to and between MTARRI Scrubber vessels to identify leaks and pipe corrosion.

1.6.4 Monthly inspection of the MTARRI Scrubber vessels for leaks and corrosion.

1.6.5 The permittee shall develop an inspection checklist including the items listed in Conditions 1.6.1 through 1.6.4. The monthly inspection shall consist of visual inspections of each component and the connections between components. The checklist shall indicate the name of the inspector, and the date and time of each inspection. The checklist shall indicate if any leaks, tears, or corrosion was identified or not, and what maintenance was or was not performed to remedy leaks, tears or corrosion. The capacity information identified in Condition 1.6.1 shall be noted on the checklist. The checklist shall be maintained and made available for Division inspection upon request.

1.6.6 When operated, weekly H_2S monitoring of biogas effluent using gas tubes shall be conducted. This data will be used as an indicator of scrubber performance and will not be used for compliance determination. The H_2S results shall be recorded in a log book available to the Division for inspection upon request. The log book shall indicate the name of the person measuring and/or recording the readings and the date of time of each reading. These H_2S readings will be used to identify the schedule of MTARRI vessel replacement activities. The primary driver for rotation of scrubber vessels will be the effluent H_2S concentration. The change procedure will consist of the following approach:

1.6.6.1 Determine which pressure vessel is saturated through H_2S sampling;

1.6.6.2 Remove the iron sponge from the saturated vessel;

1.6.6.3 Replace saturated vessel with one or two regenerated vessels; and

1.6.6.4 Verify effluent H_2S concentration through gas tube sampling.

1.6.6.5 Records of MTARRI Scrubber vessel replacement, gas tube H_2S results, equipment startup, shutdown, and malfunction of the biogas system shall be maintained for Division inspection upon request.

1.6.7 Investigate any reports of odors from plant staff or public to check the performance of the biogas system. The permittee will respond to any such reports by conducting checks of the piping system, to include accounting for wind direction and operations at the time of odor detection. Records of odor reports, their dates and times, inspections and their dates and times, and, if a malfunction is detected, the permittee's actions taken to respond to the report shall be maintained and made available for Division inspection upon request.

1.6.8 Daily gas flow meter readings to verify biogas and natural gas flow rates to boilers and flare. This information will be used to monitor compliance with the biogas and natural gas consumption limits set forth in Condition 1.1.

1.6.9 During an equipment malfunction, the source of the malfunction shall be brought off line or otherwise isolated for maintenance and repair. In the event of an emergency, the biogas will collect in the covered anaerobic lagoons, be vented to the flare, or vented through an emergency locked bypass. Any excess emissions resulting from an emergency episode will be reported on the appropriate forms and in accordance with the requirements of this permit. The cause, duration, and corrective actions taken shall be documented for each emergency episode and the records made available to the Division upon request.

1.7 The use of groundwater shall not exceed 30 percent mixed with low sulfate water per calendar month. The permittee will record the volume of municipal water supplied by the City of Fort Morgan, and of groundwater used. The total monthly volumes will be obtained from the utility meter readings provided by the City of Fort Morgan.

1.8 The Btu content of the biogas used to fuel these boilers, and combusted in the flare, shall be measured semiannually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. The Btu content of the biogas shall be based on the lower heating value of the fuel. Calculations of emissions shall be made using the heat content derived from the most recent required analysis.

1.9 The Compliance Assurance Monitoring (CAM) requirements in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV, applies S001, S010, S007 and S008: Boilers B-1, B-3, and B-5; Flare; Wastewater Treatment Plant with respect to the SO_2 limitation identified in Section II, Conditions 1.1 and 1.3 as follows:

1.9.1 The permittee shall follow the CAM Plan provided in Appendix G of this permit. Excursions, for purposes of reporting are any instance in which: the H_2S content of the treated biogas exceeds 369 ppmv; or a scrubber tank temperature reading exceeding 175°F; or failure to conduct the required monitoring. Excursions shall be reported as required by Section IV, Conditions 21 and 22.d of this permit.

1.9.2 Operation of Approved Monitoring

1.9.2.1 At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (40 CFR Part 64 § 64.7(b), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.2.2 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions (40 CFR Part 64 § 64.7(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.2.3 Response to excursions or exceedances

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or

malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable (40 CFR Part 64 § 64.7(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Determination of whether the owner of operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process (40 CFR Part 64 § 64.7(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.2.4 After approval of the monitoring required under the CAM requirements, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Division and, if necessary submit a proposed modification for this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters (40 CFR Part 64 § 64.7(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.3 Quality Improvement Plan (QIP) Requirements

1.9.3.1 Based on the results of a determination made under the provisions of Condition 1.9.2.3.b, the Division may require the owner or operator to develop and implement a QIP (40 CFR Part 64 § 64.8(a), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.3.2 The owner or operator shall maintain a written QIP, if required, and have it available for inspection (40 CFR Part 64 § 64.8(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.3.3 The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

a. Improved preventative maintenance practices (40 CFR Part 64 § 64.8(b)(2)(i), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Process operation changes (40 CFR Part 64 § 64.8(b)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

c. Appropriate improvements to control methods (40 CFR Part 64 § 64.8(b)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

d. Other steps appropriate to correct control performance (40 CFR Part 64 § 64.8(b)(2)(iv), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

e. More frequent or improved monitoring (only in conjunction with one or more steps under Conditions 1.9.3.3.a through d above) (40 CFR Part 64 § 64.8(b)(2)(v), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.3.4 If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined (40 CFR Part 64 § 64.8(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.3.5 Following implementation of a QIP, upon any subsequent determination pursuant to Condition 1.9.2.3.b, the Division or the U.S. EPA may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

a. Failed to address the cause of the control device performance problems (40 CFR Part 64 § 64.8(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); or

b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions (40 CFR Part 64 § 64.8(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.3.6 Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act (40 CFR Part 64 § 64.8(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.4 Reporting and Recordkeeping Requirements

1.9.4.1 Reporting Requirements: The reports required by Section IV, Condition 22.d, shall contain the information specified in Appendix B of the permit and the following information, as applicable:

a. Summary information on the number, duration and cause (including unknown cause, if applicable), for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable) ((40 CFR Part 64 § 64.9(a)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); and

b. The owner or operator shall submit, if necessary, a description of the actions taken to implement a QIP during the reporting period as specified in Condition 1.9.3 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring (40 CFR Part 64 § 64.9(a)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.4.2 General Recordkeeping Requirements: In addition to the recordkeeping requirements in Section IV, Condition 22.a through c.

a. The owner or operator shall maintain records of any written QIP required pursuant to Condition 1.9.3 and any activities undertaken to implement a QIP, and any supporting information required to be maintained under these CAM requirements (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions) (40 CFR Part 64 § 64.9(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other

applicable recordkeeping requirements (40 CFR Part 64 § 64.9(b)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.5 Savings Provisions

1.9.5.1 Nothing in these CAM requirements shall excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act. These CAM requirements shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purposes of determining the monitoring to be imposed under separate authority under the federal clean air act, including monitoring in permits issued pursuant to title I of the federal clean air act. The purpose of the CAM requirements is to require, as part of the issuance of this Title V operating permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of CAM (40 CFR Part 64 § 64.10(a)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.5.2 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to impose additional or more stringent monitoring, recordkeeping, testing or reporting requirements on any owner or operator of a source under any provision of the federal clean air act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.9.6 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to take any enforcement action under the federal clean air act for any violation of an applicable requirement or of any person to take action under section 304 of the federal clean air act (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

2. S002 - One Cleaver Brooks Boiler, 47.3 MMBtu/hour (B-2)
S003 - One Cleaver Brooks Boiler, 25 MMBtu/hr (B-4)

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
Natural Gas Consumption	2.1	B-2: 414.35 MMscf/year B-4: 219 MMscf/year		Recordkeeping	Annually
NO_X Emissions	2.2	B-2: 10.16 tons/year B-4: 16.71 tons/year	100 lbs/MMscf	Recordkeeping and Calculation	
CO Emissions		B-2: 17.06 tons/year B-4: 9.20 tons/year	84 lbs/MMscf		
PM Emissions	6	See Condition 6			
Opacity	7	Not to exceed 20%, except as provided below		Only Natural Gas is Used as Fuel	
		Certain Operating Conditions - Not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes			
		Not to exceed 20% (**State-Only)**			
NSPS Subpart Dc	8	Recordkeeping and Reporting		See Condition 8	

2.1 Consumption of natural gas shall not exceed the limits listed above. Annual records of the actual throughput shall be maintained and made available to the Division for inspection upon request. (Construction Permits 96MR443 and 90MR355(1 and 2), revised according to Section I, Condition 1.3 of this permit).

2.2 Emissions of air pollutants shall not exceed the limitations listed above. In absence of credible evidence to the contrary, compliance with the emission limits shall be assumed when the fuel use limits set forth in Condition 2.1 are met. (Construction Permits 96MR443 and 90MR355(1 and 2), revised according to Section I, Condition 1.3 of this permit) Emission limits are based on a heat content of 1020 Btu/scf for natural gas. For APEN reporting and fee purposes, emissions shall be estimated using the emission factors listed above, and actual fuel consumption.

3. S004 – Two Dupps' Supercookers

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
Material Feed	3.1	223,212 tons/year		Recordkeeping	Annually
Opacity	7	Not to exceed 20%, except as provided below		Nature of Process	
		Certain Operating Conditions - Not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes			
		Not to exceed 20% (**State-Only**)			
Scrubber Monitoring	3.2			Pressure Drop	Daily

3.1 Material feed to the supercookers shall not exceed the limit listed above. Annual records of the actual throughput shall be maintained and made available to the Division for inspection upon request. (Construction Permit 87MR168(2), revised according to Section I, Condition 1.3 of this permit).

3.2 The following packed bed scrubber operating parameters shall be maintained to ensure peak performance.

3.2.1 Chlorine Dioxide solution or other suitable odor control systems shall be maintained and operational while Non-Edible Rendering is in operation.

3.2.2 The pressure drop across the scrubber shall be maintained between 5 and 8 inches of water when cookers are in operation.

The scrubber system shall be maintained in accordance with manufacturer's specifications and good engineering practices. Pressure drop shall be measured and recorded daily. Measuring devices shall be calibrated semi-annually. Records shall be maintained for inspection upon request.

4. S005 - Rotary Bone Meal Dryer

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
Natural Gas Consumption Production Rate	4.1	262,800,000 scf/year 35,887 tons dry bone meal/year		Recordkeeping	Annually
PM Emissions	4.2	22.89 tons/year	7.6 lbs/MMscf (natural gas combustion) 1.22 lb/ton dry meal produced (this factor includes 90% control efficiency)	Recordkeeping Calculation	
	6	See Condition 6			
PM_{10} Emissions	4.2	14.64 tons/year	7.6 lbs/MMscf (natural gas combustion) 0.76 lb/ton dry meal produced (this factor includes 90% control efficiency)		
NO_X Emissions		13.14 tons/year	100 lbs/MMscf		
CO Emissions		11.04 tons/year	84 lbs/MMscf		
Opacity	7	Not to exceed 20%, except as provided below		Fuel Restriction and Nature of Process	
		Certain Operating Conditions - Not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes			
		Not to exceed 20% (**State-Only**)			

4.1 Natural gas consumption and production of dry bone meal shall not exceed the limits listed above. Annual records of the actual throughput shall be maintained and made available to the Division for inspection upon request. (Construction Permit 92MR1474, revised according to Section I, Condition 1.3 of this permit).

4.2 Emissions of air pollutants shall not exceed the limitations listed above. Compliance with the emission limits shall be assumed whenever the natural gas consumption limit and bone meal production limit listed in Condition 4.1. are met. (Construction Permit 92MR1474, revised according to Section I, Condition 1.3 of this permit) Emission limits are based on a heat content of 1000 Btu/scf for natural gas. For APEN reporting and fee purposes, emissions shall be estimated using the emission factors listed above, and actual fuel consumption and bone meal production.

5. S006 - Rotary Blood Dryer

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
Natural Gas Consumption Blood Drying Rate	5.1	76.212 MMscf/year 10,558 tons dried blood/year @ 10% moisture		Recordkeeping	Annually
PM Emissions	5.2	6.73 tons/year	7.6 lbs/MMscf (natural gas combustion) 1.22 lb/ton dried blood	Recordkeeping Calculation	
	6	See Condition 6			
PM_{10} Emissions	5.2	4.30 tons/year	7.6 lbs/MMscf (natural gas combustion) 0.76 lb/ton dried blood		
NO_X Emissions		3.81 tons/year	100 lbs/MMscf		
CO Emissions		3.20 tons/year	84 lbs/MMscf		
Opacity	7	Not to exceed 20%, except as provided below		Fuel Restriction and Nature of Process	
		Certain Operating Conditions - Not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes			
		Not to exceed 20% (**State-Only**)			
Odor	5.3	See Condition 5.3		Immediate Processing Dryer Exhaust Temperature	Continuous

5.1 Natural gas consumption and production of dried blood shall not exceed the limits listed above. Annual records of the actual throughput shall be maintained and made available to the Division for inspection upon request. (Construction Permit 87MR168(1), revised according to Section I, Condition 1.3 of this permit).

5.2 Emissions of air pollutants shall not exceed the limitations listed above. Compliance with the emission limits shall be assumed whenever the natural gas consumption limit and blood drying rate limits listed in Condition 5.1. are met. (Construction Permit 87MR168(1), revised according to Section I, Condition 1.3 of this permit) Emission limits are based on a heat content of 1000 Btu/scf for natural gas. For APEN reporting and fee purposes, emissions shall be estimated using the emission factors listed above, and actual fuel consumption and bone meal production.

5.3 This source shall comply with Regulation No. 2 concerning odor limitation at all times. Odor reduction practices shall include, but are not limited to:

5.3.1 Immediate processing of fresh blood and not allowing it to age more than 24 hours.

5.3.2 Except during start-up and shutdown, maintaining dryer exhaust (outlet) temperature not to exceed 200 degrees Fahrenheit when material is in the dryer.

Outlet temperature shall be measured and recorded continuously. The temperature measuring device shall be calibrated semi-annually.

6. Particulate Matter Standards (Colorado Regulation No. 1, Section III.A and C)

The fuel burning equipment, S001, S002, S003, S007, and S010, are subject to the following:

Particulate Matter (PM) emissions shall not exceed:

$$PE\ (lbs/MMBTU) = 0.5(FI)^{-0.26}$$

Where, FI = Fuel Input in MMBtu per hour.

Manufacturing processes, S005, S006, are subject to the following:

$$PE\ (lb/hr) = 3.59(P)^{0.62}$$

Where, P =Process weight rate in tons per hour.

Absent credible evidence to the contrary, compliance with this fuel burning equipment emission limit is assumed since only natural gas or biogas is permitted to be used as fuel. Absent credible evidence to the contrary, compliance with the manufacturing processes emission limit is assumed given the equipment is in compliance with the natural gas throughput limitations in Conditions 4.1 and 5.1.

7. Opacity Limits

The following opacity limits apply to those sources as indicated throughout this permit.

7.1 Opacity shall not exceed 20%, except as provided for in Condition 7.2, below (Colorado Regulation No. 1, II.A.1).

7.2 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity as measured by EPA Method 9 for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes. (Colorado Regulation No. 1, II.A.4)

7.3 Opacity of emissions shall not exceed 20% (Colorado Regulation No. 6, Part B, II.C.3 and III.C.3 - **State-Only** requirement).

This opacity limit applies at all times except during periods of startup, shutdown, and malfunction, however, at all times, the permittee shall use good operating practices. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in operation of the sources; and any malfunction of the air pollution control equipment. (40 CFR Part 60, Subpart A, as adopted by reference in Colorado Regulation No. 6, Part B, I.A)

At all times, including periods of startup, shutdown, and malfunction owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (60.11(d))

No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (60.12)

Absent credible evidence to the contrary, compliance with these opacity limits shall be assumed whenever natural gas or biogas is used as fuel for the boilers. Absent credible evidence to the contrary, compliance with these opacity limits is assumed for S004, S005, and S006 since only natural gas is permitted to be used as fuel, and when compliance with the throughput limits set forth in Conditions 3.1., 4.1., and 5.1. are met.

8. New Source Performance Standards

8.1 Boilers as identified throughout this permit are subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60, Subpart Dc, as adopted by reference in Colorado Regulation No. 6, Part A). The source shall follow the recordkeeping and reporting requirements in §60.48c.

In addition, the following requirements of Regulation No. 6, Part A, Subpart A, General Provisions, apply.

8.1.1 At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions.

Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (Reference: Regulation 6, Part A. General Provisions from 40CFR60.11)

8.1.2 No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§ 60.12)

8.1.3 Records of startups, shutdowns, and malfunctions shall be maintained, as required under § 60.7.

9. Gasoline Storage Tank

Parameter	Permit Condition Number	Limitation	Emission Factor	Monitoring	
				Method	Interval
Gasoline Throughput	9.1			Recordkeeping	Monthly
NESHAP Subpart CCCCCC	9.2	Work Practice Standard		See Condition 9.2	

Note that this emission unit is exempt from the APEN reporting requirements in Regulation No. 3, Part A and the construction permit requirements in Regulation No. 3, Part B.

9.1 The quantity of gasoline processed through this tank shall be monitored and recorded monthly. Monthly records of gasoline processed shall be retained as required by Condition 9.2.1.

9.2 **[Federal-Only]** This tank is subject to the requirements in 40 CFR Part 63 Subpart CCCCCC, "National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities", as follows:

These requirements included in this Section II.9 are only federally enforceable. As of the date of revised permit issuance [April 1, 2013], the requirements in 40 CFR Part 63 Subpart CCCCCC have not been adopted into Colorado Regulation No. 8, Part E by the Division and are therefore not state-enforceable. In the event that the Division adopts these requirements this tank will be subject to the APEN reporting and minor source permitting requirements and these requirements will be state-enforceable.

9.2.1 Upon request by the Division, the facility must demonstrate that the tank's monthly gasoline throughput is less than the 10,000-gallon threshold level (§63.11111(e)).

9.2.2 The facility must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following (§63.11116(a)):

9.2.2.1 Minimize gasoline spills;

9.2.2.2 Clean up spills as expeditiously as practicable;

9.2.2.3 Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

9.2.2.4 Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators;

9.2.3 The facility is not required to submit notifications or reports, but must have records available within 24 hours of a request by the Division to document the gasoline throughput (§63.11116(b)).

10. Emergency Generator Engines

Parameter	Permit Condition Number	Limitation	Emission Factor	Monitoring	
				Method	Interval
MACT Subpart ZZZZ	10.1	Change Oil and Filter Inspect Spark Plugs Inspect Hoses and Belts		See Condition 10.1	
Opacity	10.2	Not to Exceed 20% Except as Provided for Below		Only Natural Gas Used as Fuel	
		For Startup – Not to Exceed 30%, for a Period or Periods Aggregating More than Six (6) Minutes in any 60 Consecutive Minutes			
MACT Subpart A – General Provisions	10.3			See Condition 10.3	

Note that these emission units are exempt from the APEN reporting requirements in Regulation No. 3, Part A and the construction permit requirements in Regulation No. 3, Part B.

10.1 **[Federal - Only]** These engines are subject to the requirements in 40 CFR Part 63 Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines", as follows:

These requirements included in this Condition 10.1 are only federally enforceable. As of the date of revised permit issuance [April 1, 2013], the requirements in 40 CFR Part 63 Subpart ZZZZ, last updated on March 9, 2011, have not been adopted into Colorado Regulation No. 8, Part E by the Division and are therefore not state-enforceable. In the event that the Division adopts these requirements these engines will be subject to the APEN reporting and minor source permitting requirements and these requirements will be state-enforceable.

10.1.1 The facility must comply with the applicable requirements no later than October 19, 2013. (§63.6595(a)(1))

Operating and Maintenance Requirements

10.1.2 Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (§63.6625(e))

10.1.3 The following operating and maintenance requirements apply to this emergency stationary spark ignition RICE located at an area source for HAPs: (40 CFR Part 63 Subpart ZZZZ Table 2d)

10.1.3.1 Change oil and filter every 500 hours of operation or annually, whichever comes first (Table 2d, item 5.a)

10.1.3.2 Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first (Table 2d, item 5.b)

10.1.3.3 Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary (Table 2d, item 5.c)

10.1.3.4 During periods of startup minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. (Table 2d & §63.6625(h)).

Notwithstanding the above requirements, the following applies:

10.1.3.5 Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Condition 10.1.3.1. (Table 2d, footnote 1)

a. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 10.1.3.1. The analysis program must at a minimum analyze the following three parameters: Total Base Number,

viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (§63.6625(i))

10.1.3.6 If this engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. (Table 2d, footnote 2)

10.1.4 Compliance with the emission limitations and operating limitations in this subpart must be achieved at all times. (§63.6605(a))

Hours of Operation

10.1.5 This engine must be equipped with a non-resettable hour meter if one is not already installed. (§63.6625(f))

10.1.6 Operation of the engine shall be in accordance with the following: (§63.6640(f))

10.1.6.1 Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited. (§63.6640(f)(1))

10.1.6.2 There is no time limit on the use of emergency stationary RICE in emergency

situations. (§63.6640(f)(2))

10.1.6.3 This engine may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. (§63.6640(f)(3))

10.1.6.4 The engine may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this Condition 10.1.6.4, as long as the power provided by the financial arrangement is limited to emergency power. (§63.6640(f)(4))

Records

10.1.7 Records shall be kept of the hours of operation of the engine that is recorded through the non-resettable hour meter as required by Condition 10.1.5. Hours spent for emergency operations, including what classified the operation as emergency and hours spent for non-emergency operations must be documented. If the engines are used for demand response

operation, records must be kept of the notification of the emergency situation, and the time the engine was operated as part of demand response. (§63.6655(f))

10.1.8 Records shall be kept of the maintenance conducted on the stationary RICE in order to demonstrate that the operation and maintenance of the stationary RICE and after-treatment control device was in accordance with the maintenance plan (§63.6655(e) and §63.6655(e)(3))

10.2 Visible emissions shall not exceed 20% opacity (Colorado Regulation No. 1, Section II.A.1) except during periods of startup for which visible emissions shall not exceed 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4). Compliance with the opacity limitations shall be assumed since only natural gas is used a fuel for these engines.

10.3 This engine is subject to the requirements in 40 CFR part 63 Subpart A "General Provisions", as adopted by reference in Colorado Regulation No. 8, Part E, Section I as specified in 40 CFR Part 63 Subpart ZZZZ §63.6665. These requirements include, but are not limited to the following:

10.3.1 Prohibited activities in §63.4(a).

10.3.2 Circumvention in §63.4(b)

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D. & XIII.B; § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based upon the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

No requirements have been specifically identified as non-applicable to this facility.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.

2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Streamlined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

Permit Condition	Streamlined (Subsumed) Requirements
Section II, Condition 1.7.	Colorado Regulation No. 6, Part B, VII - Standard for Incinerators
	Colorado Regulation No. 1, Section III.B - Standards for Incinerators -
	Colorado Regulation No. 1, Section A.II.5 - Opacity limit of 30% for flares.
Section II, Condition 6	Colorado Regulation No. 6, Part B, III.C.2 - PM Emission Limit for Manufacturing Processes
	Colorado Regulation No. 6, Part B, II.C.2 – PM Emission Limit for Fuel Burning Equipment

SECTION IV - General Permit Conditions (ver 5/22/2012)

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.& e. and V.C.17.

a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.

c. Compliance certifications shall contain:

(i) the identification of each permit term and condition that is the basis of the certification;

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

(iv) method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.

d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

(i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;

(ii) approves the use of an equivalent method;

(iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or

(iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

(i) Sampling ports adequate for test methods applicable to such facility;

(ii) Safe sampling platform(s);

(iii) Safe access to sampling platform(s); and

(iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Affirmative Defense Provision for Excess Emissions during Malfunctions

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

(i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;

(ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;

(iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;

(iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;

(v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;

(viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

(ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and

(x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

(i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;

(ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;

(iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;

(v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d. and § 25-7-122.1(2), C.R.S.

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.

d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.

f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.E

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. the permitted facility was at the time being properly operated;

c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. Emission Controls for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "asbestos control."

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. Fee Payment

C.R.S §§ 25-7-114.1(6) and 25-7-114.7

a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;

b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;

d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.- II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.

b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or

b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;

(ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and

(iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.

c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:

(i) date, place as defined in the Operating Permit, and time of sampling or measurements;

(ii) date(s) on which analyses were performed;

(iii) the company or entity that performed the analysis;

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

(vi) the operating conditions at the time of sampling or measurement.

b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.

c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.

d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.

b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

The requirements in paragraphs a, b and e apply to sources located in an ozone non-attainment area or the Denver 1-hour ozone attainment/maintenance area. The requirements in paragraphs c and d apply statewide.

a. All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

   Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

e. Beer production and associated beer container storage and transfer operations involving volatile organic compounds with a true vapor pressure of less than 1.5 PSIA actual conditions are exempt from the provisions of paragraph b, above.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

A - INSPECTION INFORMATION
B - COMPLIANCE MONITORING REPORT FORMAT
C - COMPLIANCE CERTIFICATION REPORT FORMAT
D - NOTIFICATION ADDRESSES
E - PERMIT ACRONYMS
F - PERMIT MODIFICATIONS
G – COMPLIANCE ASSURANCE MONTIORING PLAN

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise stated in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

Directions to Plant:

The facility is located at 1505 East Burlington Avenue, Fort Morgan. Facility is accessed from I-76 using exit 80 in Fort Morgan.

Safety Equipment Required:

Eye Protection; Hard Hat; Safety Shoes; Hearing Protection.

Facility Plot Plan:

The plot plan and processes diagrams following list of insignificant activities are included as submitted on May 17, 2012 with the source's Title V Operating Permit Renewal Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Each individual piece of fuel burning equipment, other than smokehouse generators and internal combustion engines, which uses gaseous fuel, and which has a design rate less than or equal to 5 million Btu per hour. (See definition of fuel burning equipment, Common Provisions Regulation).

Storage of butane, propane, or liquified petroleum gas in a vessel with a capacity of less than 60,000 gallons, provided the requirements of Regulation No. 7, Section IV are met, where applicable.

Fuel storage and dispensing equipment in ozone attainment areas operated solely for company-owned vehicles where the daily fuel throughput is not more than 400 gallons per day, averaged over a 30 day period.

Storage tanks meeting all of the following criteria:

(i) annual throughput is less than 400,000 gallons; and
(ii) the liquid stored is one of the following:
  (A) diesel fuels 1-D, 2-D, or 4-D;
  (B) fuel oils #1 through #6;
  (C.) Gas turbine fuels 1-GT through 4-GT;
  (D) an oil/water mixture with a vapor pressure lower than that of diesel fuel (Reid vapor pressure of .025 PSIA).

Each individual piece of fuel burning equipment which uses gaseous fuel, and which has a design rate less than or equal to 10 million Btu per hour, and which is used solely for heating buildings for personal comfort.

Stationary Internal Combustion Engines which:

(i) power portable drilling rigs; or

(ii) are emergency power generators which have a rated horsepower of less than 260 or; operate no more than 250 hours per year and have a rated horsepower of less than 737; or operate no more than 100 hours per year and have a rated horsepower of less than 1840; or

(iii) have actual emissions less than five tons per year or rated horsepower of less than 50.

Specific equipment identified in the application:

Emergency Generators

Haz Material Trailer, 13 HP (Portable)

Fuel Storage

500 Gallon Propane Tank
1000 Gallon Diesel Tank

Solvents

8 Parts Washers

Landscaping Device

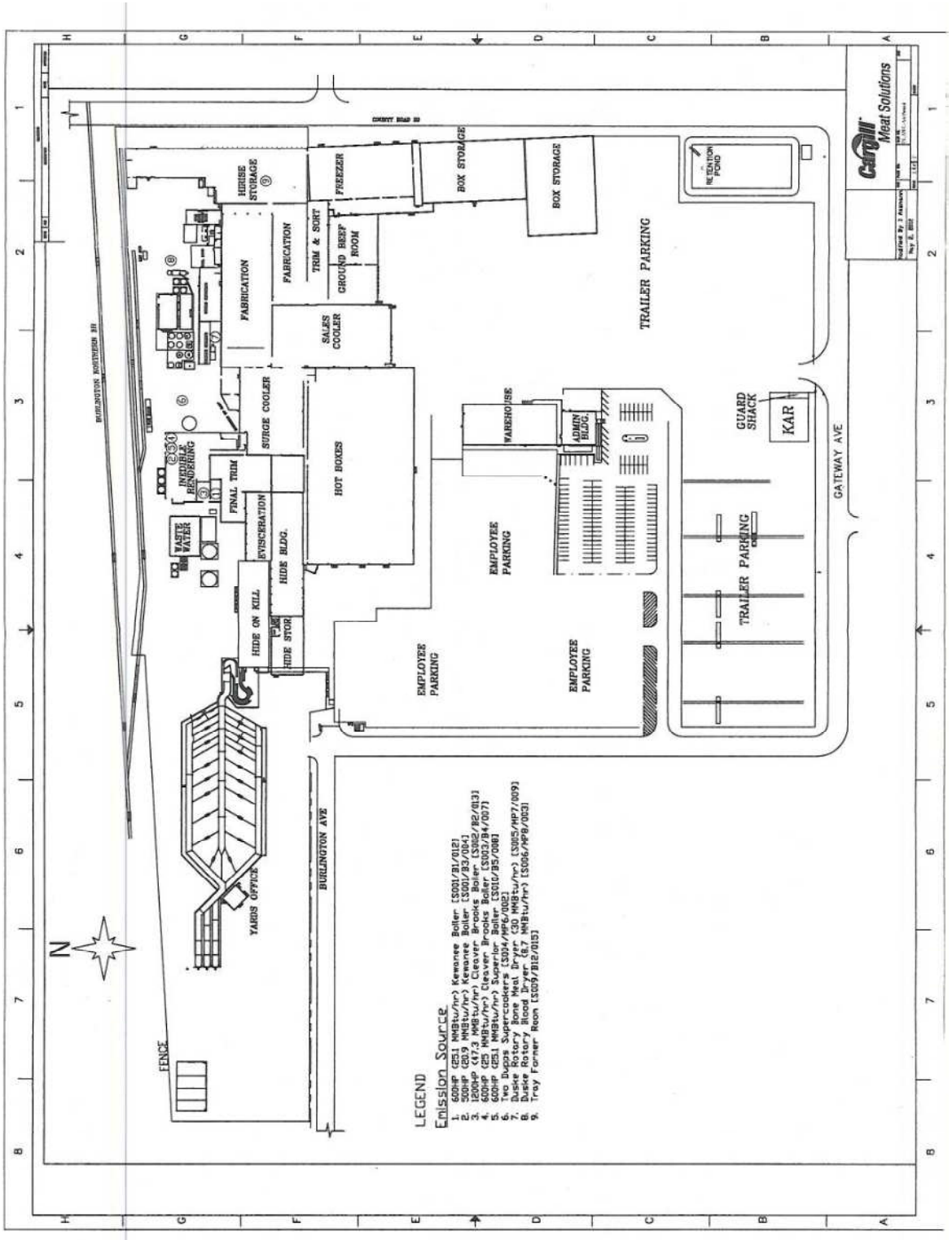
20 HP Lawnmower

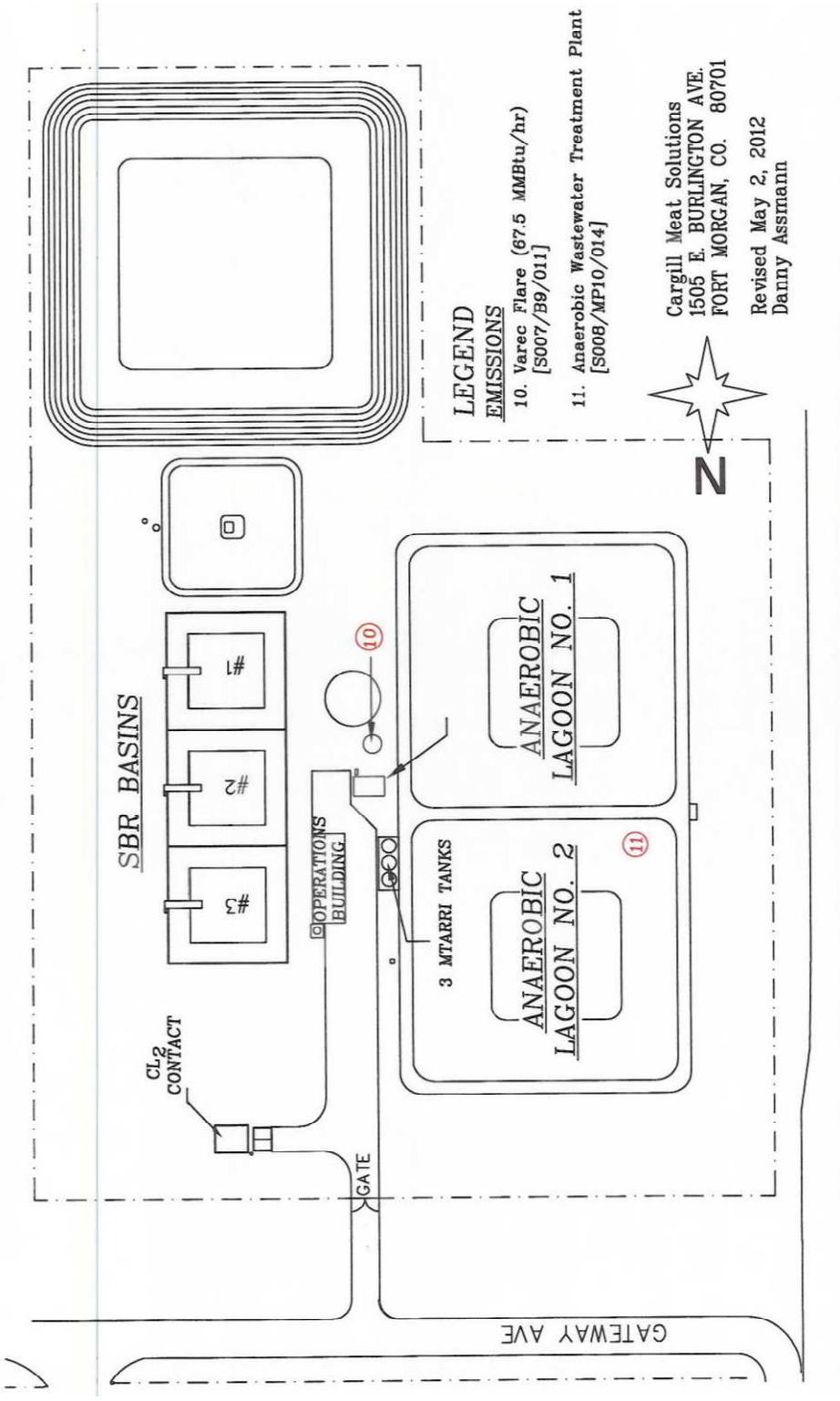
Natural Gas Heaters

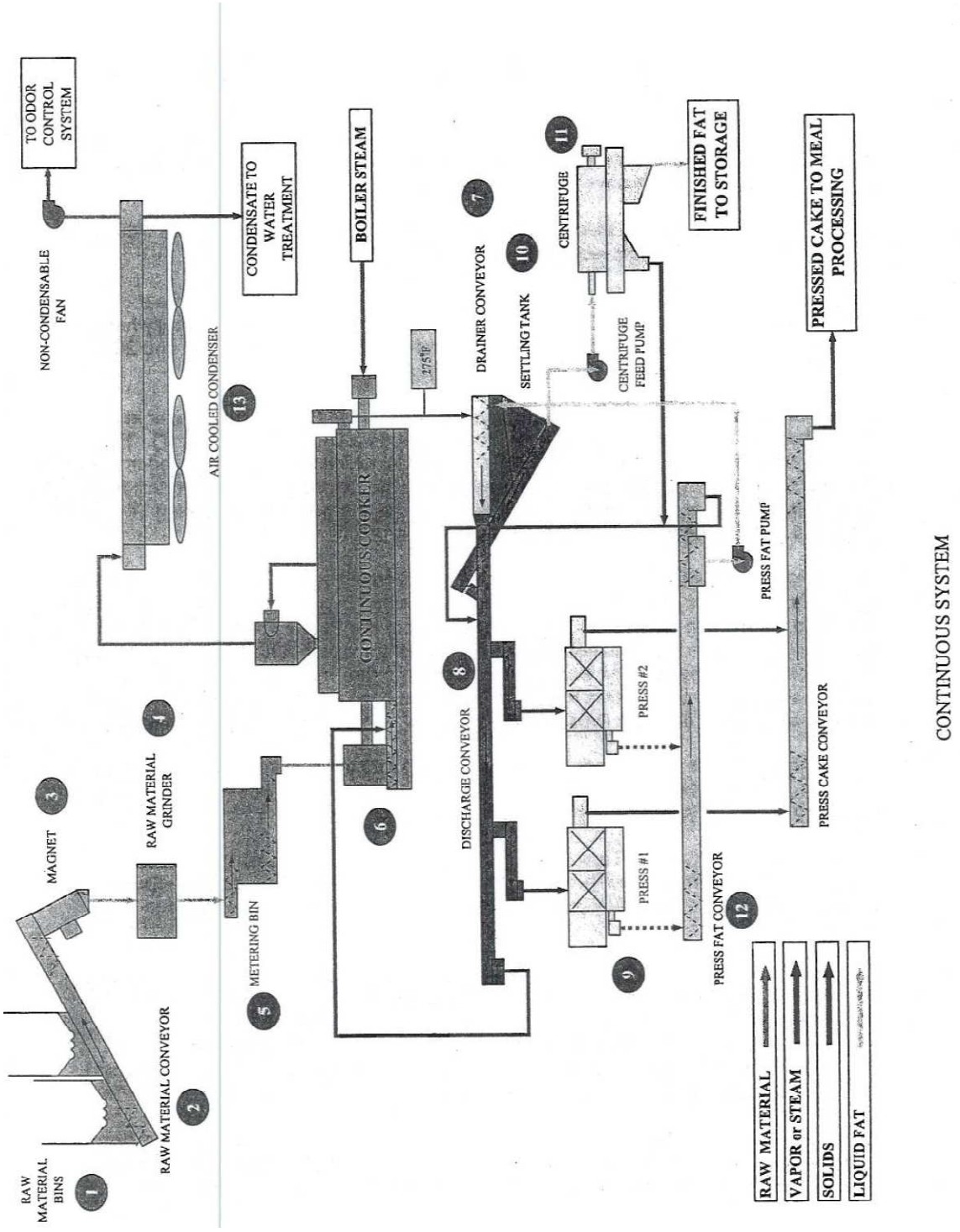
Blood Building, 1.25 MMBtu/hr
Blood Plasma Room, 0.075 MMBtu/hr
Two (2) Cafeteria, 0.231 MMBtu/hr each
Cafeteria, 0.18 MMBtu/hr
Cafeteria, 0.27 MMBtu/hr
Cafeteria 0.8 MMBtu/hr
East Edible, 1.8 MMBtu/hr
West Edible, 1.8 MMBtu/hr
Hide House, 1.53 MMBtu/hr
Hot Boxes 1-4, 1650 Btu/hr
Laboratory, 3.464 MMBtu/hr
Manager Office, 0.145 MMBtu/hr
New Fab, 4.0 MMBtu/hr

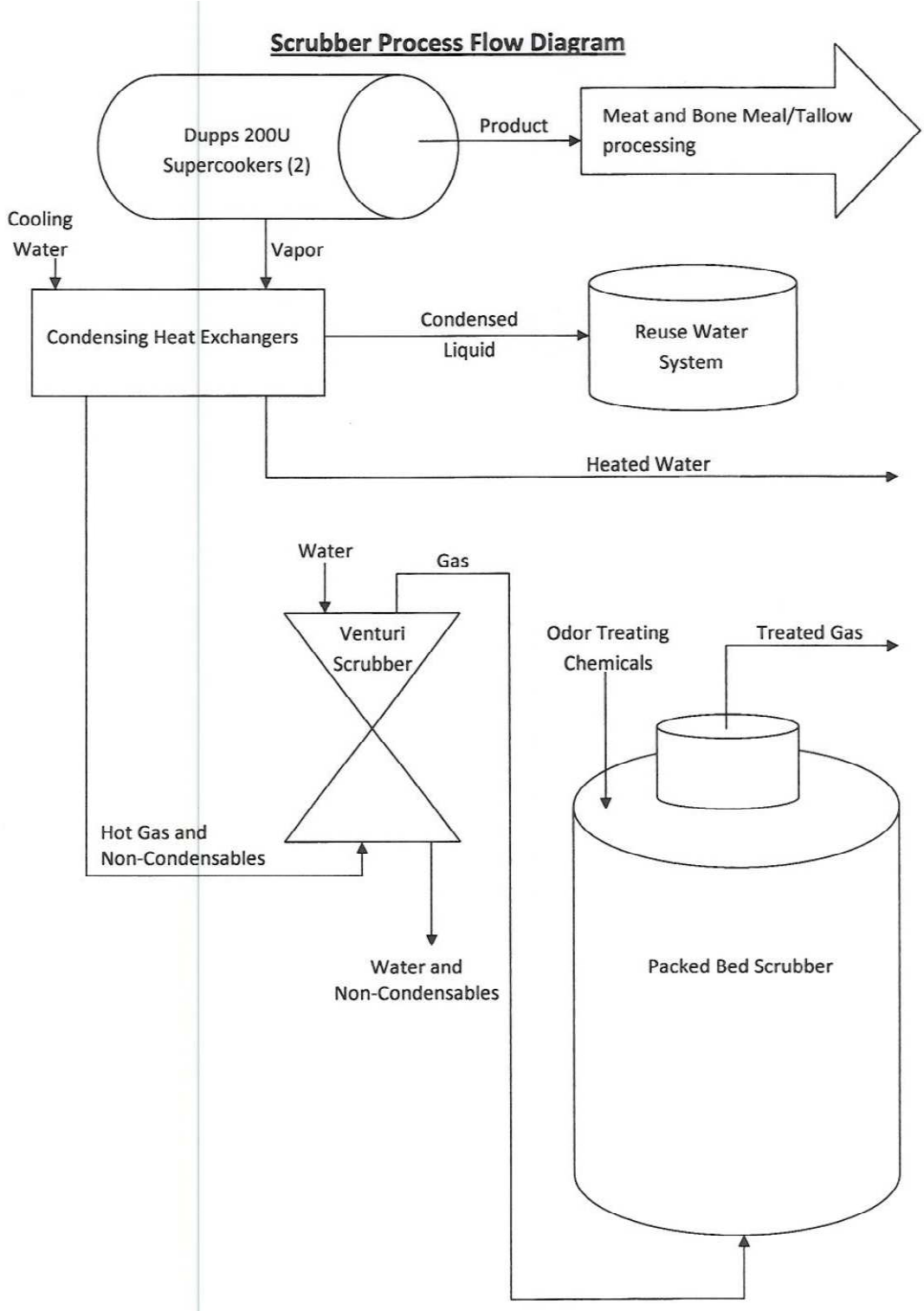
Six (6) New Kill, 5.0 MMBtu/hr each
North Makeup, 5.0 MMBtu/hr
Personnel, 0.18 MMBtu/hr
Plant Entry, 0.2 MMBtu/hr
Two (2) Rail Dock, 0.05 MMBtu/hr each
Sales Cooler, 0.066 MMBtu/hr
Tallow Polishing, 2 MMBtu/hr
Trim Sort, 4.0 MMBtu/hr
Three (3) Warehouse, 0.2 MMBtu/hr each
Warehouse, 0.175 MMBtu/hr
Two (2) Warehouse, 0.08 MMBtu/hr each
Warehouse, 0.075 MMBtu/hr

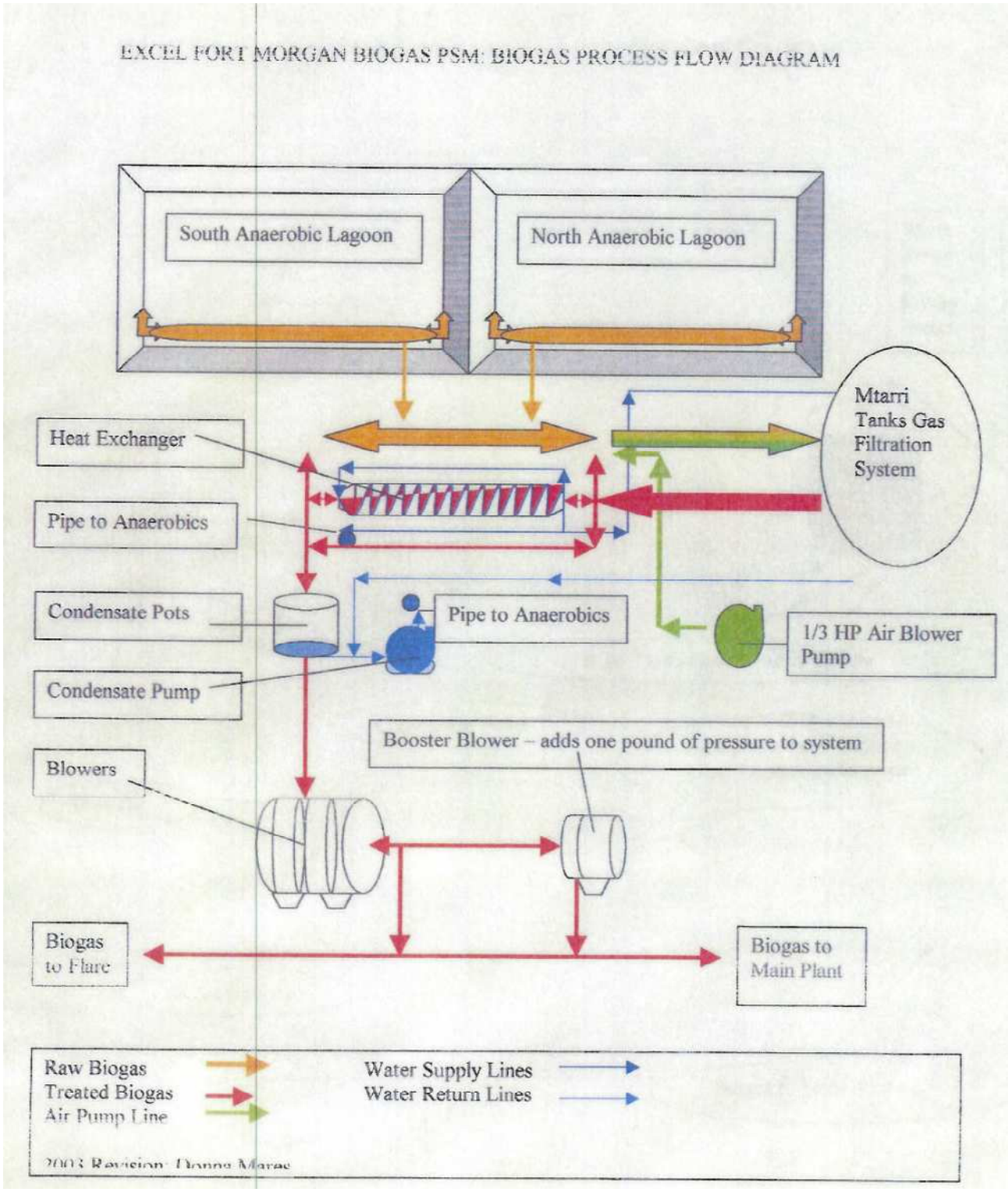
Gel Bone Room Operations
Blood and Bone Loadout Operations
Tray Former Room (Gluing Operations)
Case Sealer Room (Gluing Operations)
John Deere 325 Front Loader
Two (2) Portable Welders

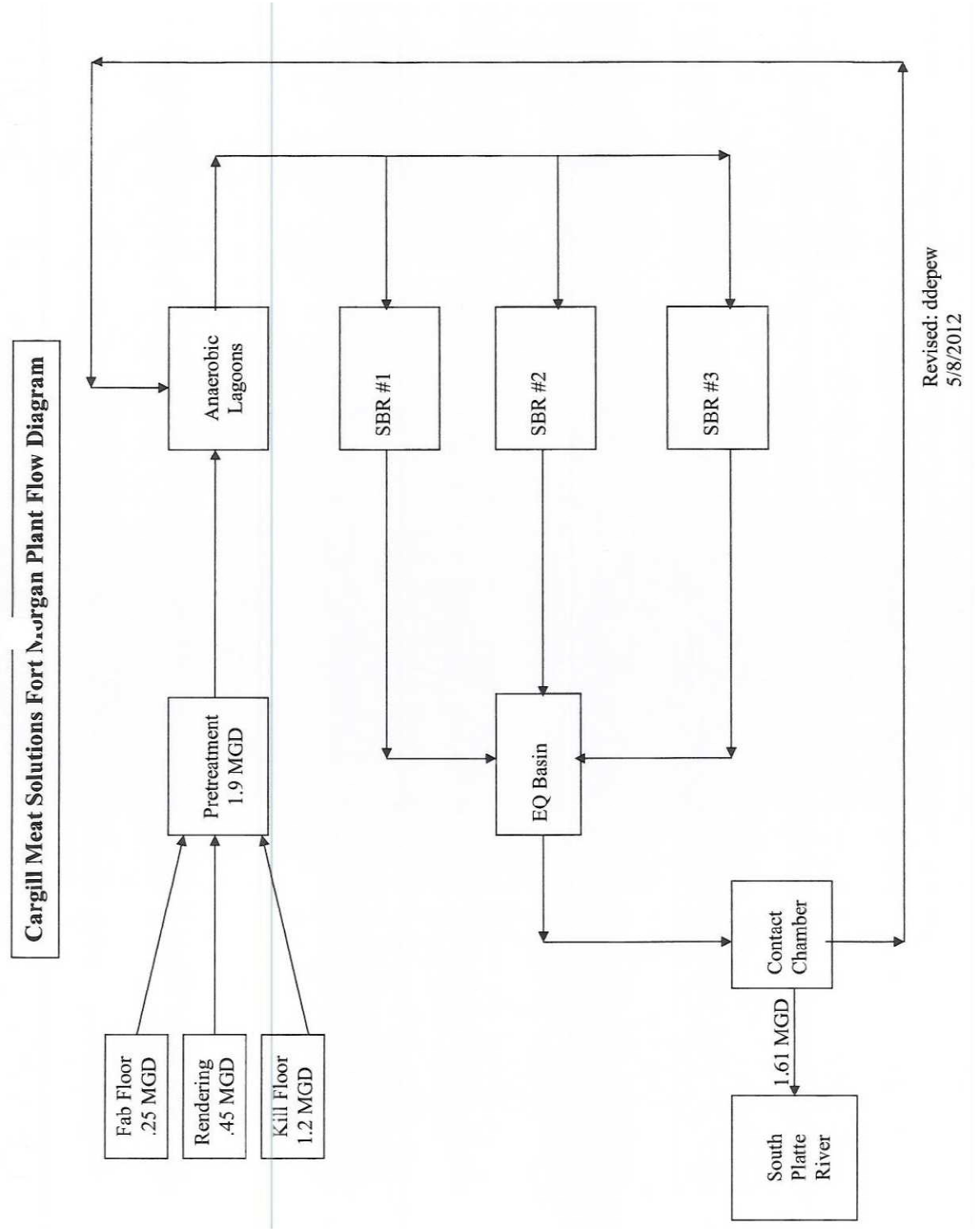

Cargill Meat Solutions
COUNTY ROAD 88
BURLINGTON NORTHERN RR
HORSE STORAGE
FREEZER
BOX STORAGE
BOX STORAGE
RETENTION POND
TRAILER PARKING
FABRICATION
FABRICATION
TRIM & SORT
GROUND BEEF ROOM
SALES COOLER
SURGE COOLER
HOT BOXES
WAREHOUSE
ADMIN BLDG.
GUARD SHACK
KAR
GATEWAY AVE
INEDIBLE RENDERING
WASTE WATER
FINAL TRIM
EVISCERATION
HIDE BLDG.
HIDE ON KILL
HIDE STOR
EMPLOYEE PARKING
EMPLOYEE PARKING
EMPLOYEE PARKING
TRAILER PARKING
YARDS OFFICE
BURLINGTON AVE
FENCE
N
LEGEND
Emission Source
1. 600HP (25.1 MMBtu/hr) Kewanee Boiler (S001/B1/012)
2. 300HP (20.9 MMBtu/hr) Kewanee Boiler (S001/B3/004)
3. 1200HP (47.3 MMBtu/hr) Cleaver Brooks Boiler (S002/B2/013)
4. 600HP (25 MMBtu/hr) Cleaver Brooks Boiler (S003/B4/007)
5. 600HP (25.1 MMBtu/hr) Superior Boiler (S010/B5/008)
6. Dusko Rotary Blood Dryer (8.7 MMBtu/hr) (S004/MP6/005)
7. Dusko Rotary Meat Dryer (30 MMBtu/hr) (S005/MP7/009)
8. Dusko Rotary Blood Dryer (8.7 MMBtu/hr) (S006/MP8/003)
9. Tray Former Room (S009/B12/015)


LEGEND
EMISSIONS
10. Varec Flare (67.5 MMBtu/hr) [S007/B9/011]
11. Anaerobic Wastewater Treatment Plant [S008/MP10/014]
Cargill Meat Solutions
1505 E. BURLINGTON AVE.
FORT MORGAN, CO. 80701
Revised May 2, 2012
Danny Assmann
N
SBR BASINS
#1
#2
#3
OPERATIONS BUILDING
3 MTARRI TANKS
ANAEROBIC LAGOON NO. 1
ANAEROBIC LAGOON NO. 2
10
11
CL2 CONTACT
GATE
GATEWAY AVE


TO ODOR CONTROL SYSTEM
NON-CONDENSABLE FAN
CONDENSATE TO WATER TREATMENT
BOILER STEAM
AIR COOLED CONDENSER
13
275°F
DRAINER CONVEYOR
7
SETTLING TANK
10
CENTRIFUGE
11
FINISHED FAT TO STORAGE
CENTRIFUGE FEED PUMP
PRESSED CAKE TO MEAL PROCESSING
CONTINUOUS COOKER
6
DISCHARGE CONVEYOR
8
PRESS #2
PRESS #1
9
PRESS FAT PUMP
PRESS CAKE CONVEYOR
PRESS FAT CONVEYOR
12
MAGNET
3
RAW MATERIAL GRINDER
4
METERING BIN
5
RAW MATERIAL CONVEYOR
2
RAW MATERIAL BINS
1
RAW MATERIAL
VAPOR or STEAM
SOLIDS
LIQUID FAT
CONTINUOUS SYSTEM


Scrubber Process Flow Diagram
Dupps 200U
Supercookers (2)
Product
Meat and Bone Meal/Tallow
processing
Cooling
Water
Vapor
Condensing Heat Exchangers
Condensed
Liquid
Reuse Water
System
Heated Water
Water
Gas
Venturi
Scrubber
Odor Treating
Chemicals
Treated Gas
Hot Gas and
Non-Condensables
Water and
Non-Condensables
Packed Bed Scrubber


EXCEL FORT MORGAN BIOGAS PSM: BIOGAS PROCESS FLOW DIAGRAM
South Anaerobic Lagoon
North Anaerobic Lagoon
Mtarri Tanks Gas Filtration System
Heat Exchanger
Pipe to Anaerobics
Condensate Pots
Pipe to Anaerobics
1/3 HP Air Blower Pump
Condensate Pump
Booster Blower – adds one pound of pressure to system
Blowers
Biogas to Flare
Biogas to Main Plant
Raw Biogas
Treated Biogas
Air Pump Line
Water Supply Lines
Water Return Lines


Cargill Meat Solutions Fort Morgan Plant Flow Diagram
Revised: ddepew
5/8/2012
Anaerobic Lagoons
SBR #1
SBR #2
SBR #3
Pretreatment 1.9 MGD
EQ Basin
Contact Chamber
1.61 MGD
South Platte River
Fab Floor .25 MGD
Rendering .45 MGD
Kill Floor 1.2 MGD

APPENDIX B
Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

(A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);

(B) fails to notify or report as required under the Act; or

(C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits.
All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "malfunction" shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

(1) A situation where emissions exceed an emission limitation or standard contained in the permit;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;

(3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard: When the requirement is an emission limit or standard
2 = Process: When the requirement is a production/process limit
3 = Monitor: When the requirement is monitoring
4 = Test: When the requirement is testing
5 = Maintenance: When required maintenance is not performed
6 = Record: When the requirement is recordkeeping
7 = Report: When the requirement is reporting

8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.[1]
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

[1] For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

Startup, Shutdown, Malfunctions and Emergencies,

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

APPENDIX B: Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Cargill Meat Solutions
OPERATING PERMIT NO: 99OPMR210
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Malfunction/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
B-1 & B-3	Kewanee Boilers, 25.1 and 20.9 MMBtu/hour – Natural Gas and Biogas Fired					
B-2	Cleaver Brooks Boiler, 42 MMBtu/hour – Natural Gas and Tallow Fired					
B-4	One Cleaver Brooks Boiler, 25 MMBtu/hour– Natural Gas and Tallow Fired					
B-5	One Superior Boiler, 25.1 MMBtu/hour– Natural Gas and Biogas					
MP-6	Two Dupps' Supercookers					
MP-7	Duske Rotary Bone Meal Dryer					
MP-8	Duske Rotary Blood Dryer					
B-9	Varec combustor flare, 67.5 MMBtu/hr					
MP-10	Anaerobic Wastewater Treatment Plant					
	Gasoline storage tank					
	Emergency generator engines					
General Conditions						
Insignificant Activities						

[1] See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

[2] Use the following entries, as appropriate

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

APPENDIX B: Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Cargill Meat Solutions
OPERATING PERMIT NO: 99OPMR210
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction_____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction _____

Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06
Is the deviation being claimed as an: Emergency _____ Malfunction __XX____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to A. Einstein, APCD
Deviation Code _____ Division Code QA: _____

APPENDIX B: Monitoring and Permit Deviation Report - Part III
REPORT CERTIFICATION

SOURCE NAME: Cargill Meat Solutions

FACILITY IDENTIFICATION NUMBER: 0870024

PERMIT NUMBER: 99OPMR210

REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name Title

Signature of Responsible Official Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

APPENDIX C
Required Format for Annual Compliance Certification Report

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Cargill Meat Solutions

OPERATING PERMIT NO: 99OPMR210
REPORTING PERIOD:

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported[1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
B-1 & B-3	Kewanee Boilers, 25.1 and 20.9 MMBtu/hour – Natural Gas and Biogas Fired						
B-2	Cleaver Brooks Boiler, 42 MMBtu/hour – Natural Gas and Tallow Fired						
B-4	One Cleaver Brooks Boiler, 25 MMBtu/hour– Natural Gas and Tallow Fired						
B-5	One Superior Boiler, 25.1 MMBtu/hour– Natural Gas and Biogas						
MP-6	Two Dupps' Supercookers						
MP-7	Duske Rotary Bone Meal Dryer						
MP-8	Duske Rotary Blood Dryer						

Operating Permit Unit ID	Unit Description	Deviations Reported[1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
B-9	Varec combustor flare, 67.5 MMBtu/hr						
MP-10	Anaerobic Wastewater Treatment Plant						
	Gasoline Storage Tank						
	Emergency generator engines						
General Conditions							
Insignificant Activities [4]							

[1] If deviations were noted in a previous deviation report , put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

[2] Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

[3] Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

[4] Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)

B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

Printed or Typed Name Title

Signature Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D
Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Matt Burgett

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX E
Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/MMBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides

NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM10 -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F
Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION

APPENDIX G
Compliance Assurance Monitoring Plan

I. Background

a. Emission Unit Descriptions:

B-1 – Kewanee 20.9 MMBtu/hour
B-3 – Kewanee 25.1 MMBtu/hour
B-5 – Superior 25.1 MMBtu/hour
Flare
Wastewater Treatment Plant

b. Applicable Regulations, Emission Limits, Monitoring Requirements

Parameter	Permit Condition Number	Emission Limitations	Monitoring Requirements
SO_2	Section II, 1.1 & 1.4	12.14 tons/year	Tank temperature and H_2S content

c. Control Technology

Iron Sponge Scrubbers

II. Monitoring Approach

The following monitoring approach will be used for the control device listed in Section 1.c for SO_2.

	Indicator 1	Indicator 2
a. Indicator	H_2S Content	Daily Inspection Of Mtarri Scrubber System
Measurement Approach	Tedlar bag samples analyzed using ASTM Method D5504.	Daily checks of the Mtarri scrubber system are conducted (see the attached page for CAM procedure). Proper operation of the following parameters are checked and recorded: Tank & Piping, Tank Temperature, and Water Drainage.
b. Indicator Range	An excursion is defined as a biogas H_2S content exceeding 369 ppmv, or failure to monitor the H_2S content. An excursion will initiate personnel to switch treatment of biogas to a regenerated scrubber.	An excursion is defined as a tank temperature above 175°F, or failure to conduct the daily Mtarri scrubber checks. An excursion will initiate personnel to switch treatment of biogas to a regenerated scrubber tank with a temperature below 175°F.
III. Performance Criteria		

	Indicator 1	Indicator 2
a. Data Representativeness	Sample shall be taken during average biogas flow rates during the previous month (a biogas flow greater than 80% of the average biogas flow rate from the previous month is considered acceptable)	Temperature shall be recorded from the thermometer located on the east side of each tank.
b. QA/QC Practices and Criteria	Sampling and analysis conducted in accordance with QA/QC procedures for ASTM Method.	Calibration and certification of each thermometer at least once every twelve months.
c. Monitoring Frequency	Weekly	Daily

III. Justification

a. Background:

This facility slaughters, processes, and packages beef.

Rational for Selection of Performance Indicators:

Elevated levels of H_2S is indicator of scrubber condition and remaining life. Daily inspection monitors for leaks, and proper tank temperature and water level.

b. Rational for Selection of Indicator Ranges:

The tank temperature was selected in accordance with operator experience.

The H_2S content of was selected as the H_2S content that was used to determine the SO_2 emissions limit. An H_2S content exceeding this limit would indicate that the scrubber is not controlling H_2S sufficiently to ensure the SO_2 limit will be met.

Cargill Meat Solutions

CARGILL FORT MORGAN
CAM (Compliance Assurance Monitoring) Procedure

MTARRI:
The daily Mtarri sheet requires date, time, operator's initials, temperature of each tank, which tanks are on-line, and a visual inspection of each tank and associated piping. This is to be recorded on the Mtarri sheet. Additional checks are to be observed each shift & periodically throughout the day.

Tank and Piping Check:

- Use all safety equipment and check readings on the gas sensors located on the outside of the Biogas building before entering. See "Quad Gas Monitor section in the Biogas PSM general section for entry into the Biogas Bldg"
- Visually inspect all three tanks, piping, flanges, and valves through the biogas system.
- Look for water leakage and sewer water smell at the effluent side, or a H2S (rotten egg) smell at the inlet side of the Mtarri system.
- Visually inspect the scrubber vessels for cracks, leakages, or discolorations.
- If there are no piping or tank issues to report this must be noted on the Mtarri Tank Inspection Sheet with a 0. If there is an issue to report this must be recorded on the Mtarri Tank Inspection Sheet with a 1.
- If issues are detected, record the observation on the Mtarri sheet, record the issue in detail in the operators log book, & notify the supervisor immediately.

Tank Temperature: (degrees Fahrenheit)

- Each Mtarri tank has a thermometer on the east side. The morning temperatures will be recorded on the Mtarri sheet & periodically checked throughout the day
- If the temperature noted on the Mtarri tank exceeds 175 degrees Fahrenheit, record the observation on the Mtarri sheet, & notify the supervisor immediately

Water Drainage:

- If drip contains more than ten gallons there is too much water in the system and needs to be drained for proper operation and water put into the system via the water spray bar must be cut back. The Iron Sponge should be damp, not saturated. If there is no visible water drained from the system then the amount of water addition needs to be increased.

Biogas Meter Readings:

- Flare readings are taken from the flare meter on the flare line, outside the biogas bldg on the south side. The number is recorded in the Flare Meter Reading column and in the Actual column is the computation of the difference in the prior number to record the actual scfm's that was ran in the 24-hour period.
- Biogas Totalizer readings are taken from the totalizer meter. The totalizer meter is located outside, on the Mtarri effluent biogas line, on the north side of the biogas building. The number is recorded in the Totalizer Meter Reading column and in the Actual column is the computation of the difference in the prior number to record the actual scfm's that was ran in the 24-hour period.

*Monthly records shall be maintained as according to the current operating permit
**All reporting shall be completed according to the operating permit